



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 6

**1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733**

April 6, 2015

Mr. Gary D. Goeke
Chief, Environmental Assessment Section
Leasing and Environment (MS 5410)
U.S. Department of Interior
Bureau of Ocean Energy Management
1201 Elmwood Park Boulevard
New Orleans, LA 70133-2394

RE: Second Final Supplemental Environmental Impact Statement (FSEIS) for Gulf of Mexico
Outer Continental Shelf Oil and Gas Western Planning Area Lease Sales 246 and 248

Dear Mr. Goeke:

In accordance with our responsibilities under Section 309 of the Clean Air Act (CAA), the National Environmental Policy Act (NEPA), and the Council on Environmental Quality (CEQ) regulations for implementing NEPA, the U.S. Environmental Protection Agency (EPA) Region 6 office in Dallas, Texas, has completed its review of the FSEIS prepared by the Bureau of Ocean Energy Management.

EPA provided comments on the Draft Supplemental Environmental Impact Statement (DSEIS) on December 5, 2013, in which the DSEIS was rated as "EC-2", i.e., EPA has "environmental concerns and requests additional information". Also, EPA provided comments on the Final Supplemental Environmental Impact Statement on April 21, 2014. While many of our comments have been addressed in the FSEIS, EPA continues to have environmental concerns. We offer the following enclosed comments for your consideration and ask they be addressed in the Record of Decision (ROD).

Thank you for the opportunity to comment on the FSEIS. Please send a copy of the ROD to my attention. If you have any questions or concerns, please contact Kimeka Price at (214)665-7438 or via email at price.kimeka@epa.gov for assistance.

Sincerely,

A handwritten signature in purple ink, which appears to read "Marie Stucky", is written over a circular official stamp.

Marie Stucky, Acting Chief
Office of Planning and Coordination

Enclosure

**DETAILED COMMENTS
ON THE
SECOND FINAL SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT
FOR THE
BUREAU OF OCEAN ENERGY MANAGEMENT'S
GULF OF MEXICO OUTER CONTINENTAL SHELF OIL AND GAS
WESTERN PLANNING AREA LEASE SALES 246 AND 248**

AIR QUALITY:

The FSEIS discusses air quality analyses (2012-2017 WPA/CPA Multi-sale EIS, WPA 233/CPA 231 Supplemental EIS, WPA 238/246/248 Supplemental EIS, Appendix D of WPA 238/246/248 Supplemental EIS) and the minimal impacts onshore. However, the air quality analysis should be expanded to incorporate a comparison of location, emission levels, and discussion of anticipated air quality impacts of WPA 246 and 248. Also, the analysis should include the estimated highest annual totals for the two lease blocks that are being analyzed for sale to compare to modeled scenarios in the referenced air quality analyses.

Additionally, the FSEIS discusses several ozone modeling studies. It should incorporate a discussion concerning potential ozone impacts for on-shore receptors, how the studies are representative of the lease sales examined here, and if the expected impacts are higher or lower than the ozone modeling results. Comparison of the highest estimated annual emissions for these two lease blocks to the emissions modeled and the corresponding locations would assist in reviewing the potential impacts of these lease block sales. In addition, please clarify if the referenced air quality analyses pertained to the 2008 Ozone NAAQS or the 1997 NAAQS.

MARINE AND COASTAL:

The FSEIS should incorporate a discussion of the February 3, 2015, National Oceanic and Atmospheric Administration's Proposed Rule and Notice of Intent to revise the boundaries for the Flower Garden Banks National Marine Sanctuary. Any impacts on the proposed project, including whether the sanctuary expansion area will be excluded or deferred from the proposed project should be included in this document.

Finally, we suggest that the description of the preferred alternative incorporate all recommended ecological mitigation measures, including stipulations. Full public disclosure of the preferred alternative should include a complete explanation of the proposed ecological mitigation measures as part of the NEPA documentation in the FSEIS. As described, mitigation measures appear to be largely tied to a range of possible stipulations which will be selected following the final NEPA documentation and as part of a separate BOEM decision-making process.